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VIA ECF

Hon. James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: Bedoya v. NYC Citrus LLC, et al. (20-cv-548)(EK)(LB)
Request to Extend Fact Discovery Deadline and
Request for Settlement Conference***

Dear Judge Cho,

We represent Defendants in the above-referenced matter. The Parties jointly submit this request to: 1) extend the fact discovery deadline until and including November 1, 2021, and 2) request a settlement conference before the Magistrate Judge. This is the first request for an extension of the fact discovery deadline and the first request for a settlement conference before the Magistrate Judge.

The Court previously ordered all discovery to be completed by August 31, 2021. The parties have exchanged written discovery but have not conducted depositions at this time. The parties have focused their efforts on settlement and request a settlement conference before the Magistrate Judge. A previous settlement conference was held on January 14, 2021 with a mediator but no settlement was reached. Since that time, Defendants have provided financial disclosures and the Parties believe that the matter is ripe for a settlement conference with the Court. As such, the Parties request that the fact discovery deadline be extended until November 1, 2021 and concurrently request a mediation session with the Court.

We thank the Court for its time and attention.

Respectfully submitted,
/s/ Joey Tsai
Joey Tsai
Attorney for Defendants

cc: Amit Kumar, Esq. (VIA ECF)